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IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Toni Murphy and Arthur Murphy Debtors.

Nationstar Mortgage LLC as servicer for Lakeview Loan Servicing, LLC Movant.

v.

Toni Murphy and Arthur Murphy Debtors/Respondents,

Kenneth E. West, Office of the Chapter 13 Standing Trustee, Trustee Additional Respondent. BANKRUPTCY CASE NUMBER 23-12591-pmm

CHAPTER 13

11 U.S.C. § 362

## **CERTIFICATION OF DEFAULT**

The undersigned, Attorney for Movant, certifies that Debtors have defaulted upon the terms of this Court's Order dated January 22, 2024. It is further certified that the attached notice, marked as Exhibit "A," was served upon the Debtors and Debtor's Attorney on March 19, 2024. The Debtors have failed to cure the default as set forth in the Notice. The Debtors have failed to make the following payments:

| Regular payments of \$1,303.09 from January 1, 2024 through April 1, 2024 | \$5,212.36; |
|---|-------------|
| Attorney Fees associated with this default                                | \$100.00    |
| TOTAL DEFAULT   | \$5,312.36  |

Accordingly, pursuant to the Stipulation and Order, Movant respectfully requests this Court to enter the attached Order granting Movant relief from the automatic stay.

Respectfully submitted,

Dated: April 18, 2024 By: /s/ Christopher A. DeNardo

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